

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ERIN M. STINES, Plaintiff, v. FIDELITY NATIONAL TITLE GROUP, INC., a Florida corporation; and JAY LEVITCH, Senior Vice President and Director of In-House Litigation, Defendants.	NO. 2:16-cv-00848-TSZ STIPULATED MOTION TO EXTEND DEADLINE FOR PERFECTION OF CROSS SETTLEMENT, AND ORDER ON MOTION
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SHBIEN CROSS, Plaintiff, v. FIDELITY NATIONAL TITLE GROUP, INC., a Florida corporation, Defendants.	NO. 2:16-CV-1867 TSZ
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For the reasons stated below, Plaintiff Shbien Cross and Defendant Fidelity National Title Group, moves the Court pursuant to LR 7(d)(1) to extend the deadline for Perfection of Settlement by 45 days to August 29, 2018.

STIPULATED MOTION AND ORDER TO EXTEND DEADLINE FOR PERFECTION OF SETTLEMENT- 1 (2:16-cv-00848-TSZ)	CARNEY BADLEY SPELLMAN, P.S. 701 Fifth Avenue, Suite 3600 Seattle, WA 98104-7010 (206) 622-8020
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1 **I. REASONS FOR EXTENDING DEADLINE**

2 The parties reached agreement for the settlement of Plaintiff Cross' suit on May 14,
3 2018 and promptly notified the Court. On May 15, the Court entered an order dismissing
4 Cross' claims and setting July 15 as the deadline for perfecting the settlement. Dkt. #122.

5 Cross has a Chapter 13 bankruptcy case pending in the Western District of
6 Washington (Case No. 14-10573), her settlement must be approved by the Bankruptcy Court.
7 This has caused the process of perfecting the settlement of the above-entitled case to proceed
8 more slowly than usual.

9 Cross is represented in the bankruptcy case by attorney David A. Kubat. After
10 obtaining the necessary information, attorney Kubat filed a *Motion to Approve Personal*
11 *Injury Settlement* in the Bankruptcy Court matter on June 18, 2018. Dkt. #39. That motion is
12 noted for decision on July 18, 2018. Mr. Kubat anticipates that the Bankruptcy Court will
13 approve the settlement on that date or shortly thereafter. But July 18 is three days *after* the
14 current deadline date set by this Court for perfection of the settlement in this case.
15 Accordingly, the parties request that this Court enter an order extending the deadline for
16 perfection of the settlement in this case by 45 days, so that the deadline would be August 29,
17 2018.

18 **II. CONCLUSION**

19 For these reasons, the parties move the Court for entry of the proposed order that
20 appears below.
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1 SO STIPULATED AND AGREED this 25th day of June, 2018.

2 s/ James E. Lobsenz

3 James E. Lobsenz WSBA #8787

4 Lucinda J. Luke WSBA #26783

5 Attorneys for Plaintiff

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25 STIPULATED MOTION AND ORDER TO EXTEND DEADLINE
26 FOR PERFECTION OF SETTLEMENT- 3
(2:16-cv-00848-TSZ)

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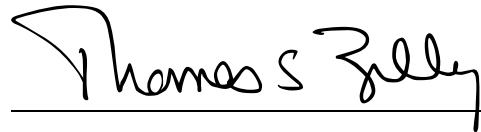
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ORDER ON MOTION

It is so ordered.

DATED this 27th day of June, 2018.

A handwritten signature in black ink that reads "Thomas S. Zilly". The signature is written in a cursive style with a large, stylized 'T' and 'Z'.

Thomas S. Zilly
United States District Judge